

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Sandro G. Zhinin

Case No. 17- 448-m

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 4, 11, and 25, 2017 in the county of Northampton in the Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Title 18, United States Code,
Sections 2423 (b)

Offense Description

Travel to engage in illicit sexual contact with a minor

This criminal complaint is based on these facts:
SEE ATTACHED AFFIDAVIT.

☒ Continued on the attached sheet.

James P. Munjone
Complainant's signature

James P. Munjone, Special Agent HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/27/2017

City and state: Allentown, PA

Henry S. Perkin
Judge's signature

The Hon. Henry S. Perkin, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT OF PROBABLE CAUSE

I, James P. Munjone, a Special Agent with Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI), Immigration and Customs Enforcement (ICE) assigned to the Special Agent in Charge, Philadelphia (SAC/PH). I have been employed as an Agent of Homeland Security Investigations since June 2005. I have completed basic and agency specific training at the Federal Law Enforcement Training Center in principles of law and conducting criminal investigations. I am currently assigned to the HSI Cyber Crimes Group where I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252(a) and 2252A. I also conduct computer forensics examinations relating to child exploitation. I have conducted in excess of 200 child exploitation forensic examinations. I have attended numerous professional training courses related to child exploitation/forensic examinations.

2. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements in this Affidavit are based in part on information provided by Pennsylvania State Police Trooper Barton F. Josefowicz, III, and on my investigation of this matter. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each fact known to me concerning this investigation.

4. I submit there is probable cause to believe that on or about March 4, 2017, March 11, 2017 and March 25, 2017, Sandro G. Zhinin traveled to engage in illicit sexual conduct with

a minor, in violation of United States Code, Section 2423(b), which states “a person who travels in interstate commerce ... for the purpose of engaging in any illicit sexual conduct with another person” shall be punished.

5. On March 11, 2017, an 11-year-old girl, referred to here as the “Minor” victim, was reported missing from her residence located in Northampton Borough, Northampton County, Pennsylvania to the Northampton Borough Police Department by her parents. Later that day, the Minor returned home and told police officers an adult male known to her as “Sam” at the 4th Street Park in Northampton early that day had picked her up. “Sam” then drove her to the Scottish Inn, located in Hanover Township, Lehigh County, where he sexually assaulted her in Room 109.

6. On the same date, the Minor submitted to a sexual assault examination at Lehigh Valley Hospital – Muhlenberg by Certified Registered Nurse Practitioner. The Nurse Practitioner reported the Minor had injuries consistent with vaginal penetration.

7. On March 13, 2017, the Minor was interviewed by a Child Interview Specialist at the Lehigh County Child Advocacy Center. The Minor related the following: She met an individual known to her only as “Sam” via the website “Meet Me”. They began communicating via the websites / applications “Skype” and “Snapchat¹” and “Sam” eventually arranged to meet up with the Minor in person. The Minor reported she had told “Sam” at some point during their communications that she was eleven (11) years old. The Minor further reported that “Sam” picked her up on March 4, 2017, in a small blue two (2) door car, which the Minor believed was

¹ MeetMe is an online social networking service that enables individuals to locate and communicate with other individuals; Skype is an instant messaging online application that provides real time video chatting service that enables users to see the individual they are communicating with via webcam; and Snapchat is also an instant messaging application where videos and images can be shared with others; communications, videos and images shared via Snapchat are only available for a short period of time by design before being permanently deleted.

a rental vehicle, from the 4th Street Park in Northampton Borough around midday. "Sam" then drove her to the Red Roof Inn in Hanover Township, Lehigh County where he rented a room while she waited in the car. "Sam" came back out and took her to the rented room where he began to kiss her and take her clothes off. The Minor tried to back away from "Sam" and told him that she was too young to have sex. "Sam" told the Minor that she could trust him and asked her if she wanted to have sex, to which the Minor replied no. "Sam" proceeded to put on a condom, place his penis in the Minor's vagina and have sexual intercourse with her after being told no. The Minor related that she kept saying "Ow" while "Sam's" penis was in her vagina and told him that it hurt and she did not want to do this. The Minor said this prompted "Sam" to go faster until he finished. "Sam" then removed the condom and flushed it down the toilet. Eventually "Sam" drove her to the area of her house and dropped her off down the street.

8. The Minor further reported that "Sam" picked her up again on March 11, 2017, in the mid afternoon from the 4th Street Park, but this time he was driving a tan sport utility vehicle. He drove her to the Scottish Inn in Hanover Township, Lehigh County where he already had a room rented. They proceeded to Room 109 where "Sam" pushed her down on the bed and began to kiss her. At some point, "Sam" told her that he wanted to have sex again and she informed him that she did not want to. "Sam" proceeded to have vaginal intercourse with the Minor while wearing a condom. The Minor advised that she tried to stop "Sam" by moving around and trying to get off the bed and at some point she kicked him. "Sam" finished and flushed the condom down the toilet. The Minor related that "Sam" waited for a few minutes before putting on another condom and having vaginal intercourse with her again. Once he was finished, he again flushed the condom down the toilet. The Minor reported that she looked at her phone and observed several missed calls and text messages from family members indicating that they were

looking for her. This caused “Sam” to panic and he immediately drove her to the area of her house and dropped her off on the corner.

9. The Minor described “Sam” as a dark-skinned male, possibly Spanish, from New York. She reported that “Sam” had a round face, brown eyes and short black hair.

10. Pennsylvania State Police learned Room 109 at the Scottish Inn was rented to Sandro G. ZHININ on March 11, 2017. At check-in, ZHININ presented his New York Driver License and a Capital One MasterCard debit card (Ending in 8427) to rent the room. The total amount paid to rent the room was \$99.00.

11. The Pennsylvania State Police prepared a photo lineup which contained eight (8) individuals, one of them being ZHININ. Trooper Barton Josefowicz showed the photo lineup to the Minor in the presence of her parents on March 13, 2017. The Minor positively identified ZHININ as the individual she knew as “Sam”.

12. On March 13, 2017, the Pennsylvania State Police contacted the Red Roof Inn and learned that ZHININ rented a room on March 4, 2017 and checked out on March 5, 2017. ZHININ presented his New York Driver License to rent the room and paid for it with a Capital One MasterCard debit card (Ending in 8427). The total amount paid to rent the room was \$78.58.

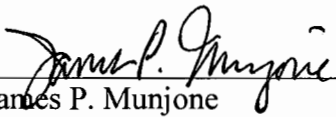
13. On March 23, 2017, the Pennsylvania State Police secured and executed a Search Warrant on ZHININ’s Capital One Checking Account. The Capital One Checking Account records received via the warrant revealed that ZHININ’s debit card (Ending in 8427) was used to make purchases at the Red Roof Inn on March 4, 2017 for \$78.58 and the Scottish Inn on March 11, 2017 for \$99.00. Further, it listed a home address, in Brooklyn, New York.

14. On March 25, 2017, Pennsylvania State Police, in cooperation with the Minor and her parents, communicated with ZHININ. ZHININ planned to travel once again to meet the Minor victim. Once again, ZHININ arranged to pick up the 11-year-old girl at the 4th Street Park in Northampton Borough. The meeting was planned for Saturday, March 25, 2017. Members of the Pennsylvania State Police conducted surveillance of the park. At approximately 1:00 p.m., ZHININ was observed in the area of the park and he was taken into custody without incident.

15. A search of ZHININ's person after his arrest revealed he was in possession of a hotel keycard for Room 239 at the Red Roof Inn (1846 Catasauqua Road, Hanover Township, Lehigh County). Hotel staff verified that ZHININ had just checked in to the room at approximately 1230 hours on March 25, 2017.

16. Sandro ZHININ has a New York driver's license and resides in Brooklyn, New York. Zhinin is employed by RealMatch, LLC, in Manhattan, New York. Zhinin was born in 1983; he is 33 years old.

17. Your affiant, therefore, respectfully requests that the arrest warrant be issued authorizing the arrest of Sandro ZHININ.


James P. Munjone
Special Agent
Homeland Security Investigation

Sworn and subscribed before me this 27th of March, 2017.


HENRY S. PERKIN
UNITED STATES MAGISTRATE JUDGE